

# **Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan**

January 1, 2020 – December 31, 2021

## **Washington County**

# Contents

<b>Section 1- Assurances .....</b>	<b>3</b>
<b>Section 2 Administration .....</b>	<b>5</b>
Section 2.1 Administrative Structure .....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	8
Section 2.3 OTDA Jobs Staff Agreement.....	9
OTDA Jobs Program Services – Target Groups.....	9
Other Services Requested.....	9
Section 2.4 Access to Services at New York State Career Centers .....	9
<b>Section 3 Engagement and Work Preparation.....</b>	<b>10</b>
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)) .....	10
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	10
Section 3.3 Assessment and Employment Planning.....	10
TA Assessment.....	10
TA Employment Plan .....	12
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	12
Section 3.5 Job Development .....	19
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	19
Section 3.7 Work Verification .....	22
The Quality Assurance (QA) plan include the following elements: .....	23
The District’s Quality Assurance Process is as follows:.....	24
Use of Outside Providers/Vendors.....	24
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	25
Section 3.9 Strategies/Procedures for Increasing Program Attendance .....	25
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	25
Section 3.11 Strategies for reducing the need for TA .....	26
<b>Section 4 Support Services .....</b>	<b>26</b>
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	26
Section 4.2 Transitional Support Services .....	28
Section 4.3 Extended Support Services.....	28
<b>Section 5 Conciliation, Sanction and Dispute Resolution Procedures .....</b>	<b>28</b>
Section 5.1 Conciliation.....	28
Section 5.2 Sanctions.....	30
Section 5.3 Dispute Resolution .....	31
<b>Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....</b>	<b>31</b>
Section 6.1 Disability Determination Process and Tools.....	31
Section 6.2 Mental Health Screening and Assessment .....	32
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	33

## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Washington County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2020 through December 31, 2021. As Commissioner of Washington County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ TLD 12/31/2019

Tammy L. DeLorme, Social Services Commissioner

12/31/2019, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program.

Following is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program. The responsibilities of each office are described below.

The Washington County Department of Social Services Employment Unit operates the district's employment program within the local Department of Social Services structure. The Employment Unit consists of (1) Principal Social Welfare Examiner, supervising the employment programs; (1) OTDA Jobs Representative; (4) Welfare Employment Representatives. (4) Welfare Employment Representatives maintain an employment caseload which is distributed equally alphabetically (1) Typist as Support Staff for the Employment Team. Employment Representatives share job development duties, responsibility for orientations and each meet with Temporary Assistance applicants that are within their letter scheme to complete the Employment Assessment and Employability Plan within the application process.

The following Employment Programs services are provided by this unit: orientation, assessment, employability planning, work activity assignment, monitoring participation in assigned activities, monitoring of treatment plans of exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services and disability determination as to whether the individual is exempt, non-exempt or work limited. The Employment Unit is also responsible for conciliation, sanction, dispute resolution and coordination of supportive services that are provided to enable individuals to participate in employment activities. Employability determinations are done in conjunction with the Temporary Assistance Unit. The Employment Unit also interacts extensively with the Agency's Investigations Unit for Fair Hearings and Investigative Interviews as well as the Services Unit for at-risk clients.

The district has a contract with The Washington County Career Center to provide employment related services to our clientele. The Washington County Career Center provides an intensive job search training program called Roadmaps. The Roadmaps Program is designed to work individually with each assigned participant on their job searching skills, that incorporates work experience assignment, TABE testing in the course of the program to determine literacy levels and math proficiency for non-exempt and work limited client population.

### **Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies**

#### **Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services**

Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not limited to:

employability determinations; development of assessments and employment plans; conciliation and grievance activities; provision of work activities such as job readiness training; education and job skills training; monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency; job development; job placement and retention services; and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis, and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments. Districts must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Washington County Career Center	\$30,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Roadmaps Program which is an intensive Job Search Training, hands-on activities and self-directed activities. Provide TABE literacy and math testing and screening for educational training to improve literacy level. Program referrals. Work Experience assignment.
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants but which have no direct financial agreement with the district.

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Liberty House		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	This program is for individuals with developmental disabilities or a mental health diagnosis. Job search, job coaching, supported employment, assistance with social security application process, assistance with application for ACCESS VR.
OTDA Jobs Staff		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job development, job search review and job referrals.
WWAMH Eastside Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Community Service for clients with mental health diagnosis.
Southern Adirondack Child Care Network		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assist families with locating child care.
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	



### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

("X" signifies those that apply in this district)

<b>Services</b>	<b>—</b>	<b>Target Groups</b>	<b>—</b>
Assessment/Employment Plan	—	Applicants	—
Supervised Job Search	—	FA & SNA with children	—
Job Readiness Training	—	SNA without Children	—
Job Club	—	SNAP	—
Job Placement Services	—	TANF 200%	—
Grant Diversion	—		—
Job Development (employer outreach)	—		—
WOTC pre-certifications	—		—

#### Other Services Requested

Described below are additional services/duties which will be requested of Jobs staff (e.g. WTWCMS data entry, case conferencing, job fairs)

Case conferencing, Job Fairs and Job Readiness Training.

### Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:

- The district has employee(s) physically present at a Career Center
- The district has contract staff physically present at a Career Center
- The district makes available direct access to its program staff via phone or technology at a Career Center
- The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
- Other:

b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

Washington County DSS and the Career Center are both located in Building B of the Washington County Municipal Center. Washington County DSS Employment Programs has a contract with the Career Center called the Roadmaps program, the Career Center has one counselor assigned to that program who has developed a working relationship with the Welfare Employment Representatives, which has improved communication and information sharing between DSS and the Career Center.

## **Section 3 Engagement and Work Preparation**

### **Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))**

For purposes of satisfying the federal requirement which states that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

### **Section 3.2 Orientation (Reference 18 NYCRR 385.5)**

Check one of the following:

- The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.
- In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

Described below is the manner in which the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both), including the orientation procedure for exempt individuals and non-exempt individuals, if different:

Orientation for both applicants and recipients are completed individually during assessment and reassessment appointments . The orientation procedure is the same for both non-exempt and exempt individuals. The orientation process begins at the time the individual inquires about applying for Temporary Assistance.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters assessments directly into WTWCMS
  - The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
  - The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. Attached is the local equivalent.

The local equivalent does not contain additional elements other than what is required.

The local equivalent does contain additional elements beyond what is required, listed below:

- b. Describe the district procedure for the completion of an employment assessment: Washington County uses the LDSS-4980 State Assessment Tool and when the case becomes active, the information is then entered into WTWCMS. Washington County Career Center completes TABE testing for literacy and math levels for non-exempt individuals. This testing is typically completed during the Roadmaps Program. Non-exempt TANF eligible applicants and recipients are assigned to the Roadmaps Program. Welfare Employment Representatives complete the employment assessment and employability plan while the client is in applicant status. This would include all adult individuals with or without children and also 16 and 17 year olds not in school. Welfare Employment Representatives update the employment assessment and employment plan as changes in the client's needs and household occur and no less than annually. Clients determined to have multiple and significant barriers meet face-to-face with the Welfare Employment Representative and possibly Child Services Workers and representatives from other agencies that could assist the client with the presenting issues that are interfering with their ability to be self-sufficient. Washington County understands the need to look at all the issues in the household in order to assist the client in becoming self-sufficient and often time's cases with multiple or significant barriers are managed with a team approach. This district has weekly case reviews where representatives from a number of units within the Agency meet to discuss the presenting issues and develop an action plan to better assist the clients.
- c. The district administrative unit or contractor responsible for conducting assessments is: The Employment Unit consisting of Welfare Employment Representatives are responsible for conducting the employment assessments.
- d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)] Welfare Employment Representative-This is a Civil Service position only offered as a promotional opportunity to Social Welfare Examiners with 2 or more years of experience in related social work field. All Welfare Employment Representatives complete the Employment Services Training Institute (ESTI).
- e. Applicants in households **with** dependent children are required to participate in completion of an assessment:  
 Yes       No
- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:  
 Yes       No
- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:  
 Yes       No

- h. How often and under what circumstances is the assessment updated?  
Welfare Employment Representatives update the employment assessment as changes in the client's needs and household occur and no less than annually.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
- The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters employment plans directly into WTWCMS.
  - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
  - The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent.
    - The local equivalent **does not** contain additional elements other than what is required.
    - The local equivalent **does** contain additional elements beyond what is required, listed below:
- b. Check one of the following:
- The same administrative unit or contractor that conducts employment assessments also develops employment plans.
  - A different district administrative unit or contractor develops employment plans, and their qualifications include
- c. Describe the district procedure for the completion of an individual's employment plan. Washington County Welfare Employment Representatives use the LDSS 4978 to create an individual's employment plan. The employment plan is completed with the individual either face to face or via telephone. The individual's input and employment regulations are considered when developing the employment plan. When the employment plan is completed the individual and worker sign the employment plan agreeing with the terms of the employment plan. The individual is given a copy of the completed employment plan.
- d. How often and under what circumstances is the employment plan updated?  
Welfare Employment Representatives update the employment plan as changes in the client's needs occur and no less than annually.

### Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)

- a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

All non-exempt applicants for Public Assistance in Washington County are given employment requirements during the application process. These requirements include a supervised job search, a minimum of 10 employer contacts and 30 hours per week is assigned, appointment with the OTDA Jobs Representative and TANF eligible applicants are assigned to the districts Job Search Training Program called Roadmaps. In this way if the case does open the individual is already participating. When the case becomes active and benefits have been issued the client may then assigned to a work experience site. Washington County's participation standard is up to 40 hours per week combined work activities. The Welfare Employment Representatives monitor a caseload and are responsible for enrolling their clients in countable work activities. Likewise they also monitor an exempt caseload with regard to participation and engagement. In addition, regular monthly caseload reviews are conducted by the unit supervisor to check each case for participation and the findings are reviewed with the Welfare Employment Representatives during their weekly 1:1 meetings. The unit is also able to call up daily opening lists so that no Temporary Assistance case is overlooked and can be assigned to the appropriate worker for enrollment in a countable activity. For the individual who goes from exempt to non-exempt the typical time frame is 14 days or sooner before they are placed in a countable activity. In Washington County the Employment Representatives determine the employability of the client based on the completed medical form received by the Agency. When the worker determines the client is no longer exempt the client is scheduled for an appointment to update employment assessment and employability plan.

- b. Estimate the number of individuals expected to receive employment services:

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	42	51

- c. Describe below how the district uses work participation management reports available through COGNOS or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

COGNOS reports are used routinely to monitor the districts work participation activity. Specifically, the "TANF and SN MOE Detail Report" and the "Participation and Engagement Status Report" are reviewed monthly by the supervisor and workers as it is a reliable case by case summary of those clients participating and not participating. During weekly 1:1 supervision, cases are discussed to determine appropriate

employment activity assignment giving priority to the non exempt, non participating and not countable individuals.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

Washington County does not mandate Non-Temporary Assistance SNAP applicants and recipients to participate in SNAP E&T work activities.

If the district is not mandating SNAP E&T work activity assignments, please describe how NTA SNAP work registrants are informed of the services available, upon request, for assistance with job search activities. (Please note: At a minimum, districts are required to make available job search as a SNAP E&T activity to NTA SNAP applicants and recipients):

In accordance with regulations there are signs in our reception area advising we can assist NTA SNAP applicants and recipients with their job search activities. NTA applicants and recipients are informed at each contact of job search services that are available. If a NTA SNAP client requests assistance with job search efforts they are seen by a Welfare Employment Representative and may be referred to the OTDA Jobs Staff Representative for job referrals.

- e. Describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

- 1. The district assigns TA **applicants** to Job Search.       Yes    No

If yes, the process for engaging TA **applicants** is: As discussed in Section 3.4 non-exempt Public Assistance applicants are assigned to a supervised job search, an appointment with the OTDA Jobs Representative and are assigned to attend the district's job search training program. Job search in Washington County is defined as a minimum of 10 contacts per week and a minimum of 30 hours per week for those individuals assigned to a job search. Applicants are required to report job search outcomes on a log they keep of the time required to complete such activities as submitting applications, time spent interviewing, preparing and sending follow-up materials, identification of jobs and travel time between potential employers. The job search log is reviewed on a weekly basis via in-person contact to assess how complete and reasonable the search is. The individual's search for work is supported by the Agency's job development procedures where job referrals are tailored to the client work abilities and interests. The client is advised to document all work activities on the log to ensure the client is not being required to participate more than 40 hours per week in combined activities.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	30	
SNA Individuals	10	30	

2. The district assigns TA **recipients** to Job Search.  Yes  No

If yes, the process for engaging TA **recipients** is: The recipient job search procedure is exactly as described above and is a continuum of what the individual is doing as an applicant. Hours of job search may be adjusted for individuals participating in a combination of work activities, but will not exceed a total of 40 hours per week.

- f. Describe the district’s process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual’s required work activities. If the district always approves self-employment as part of an individual’s required work activities, please note this policy below. Washington County may allow self-employment as a work activity to the extent of profit divided by minimum wage and the calculated hours per week would count toward their 40 hours of work activity provided the employment will lead to self-sufficiency. If there weekly total self-employment does not total 40 hours, they would be assigned additional work activities to a combined total not to exceed 40 hours per week.
- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

Activity and Definition	
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Subsidized Private Sector Employment</b> - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Subsidized Public Sector Employment</b> - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>



<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Search</b> - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<p><b>SNAP E&amp;T Supervised Job Search</b>- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Vocational Education</b> - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Skills Training</b> - Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Education Training</b> - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Secondary School</b> - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Provision of Childcare for Individual Participating in Community Service</b> - Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Other</b> - Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>

### Section 3.5 Job Development

The district conducts or accesses job development services to expand job opportunities for TA and SNAP participants.       Yes       No

If yes, the district participates in job development activities in the following manner:

District staff contacts employers to solicit jobs for TA and SNAP participants.

Below is the description of how this is done, including number of staff, frequency of contacts, etc.:

Local district Welfare Employment Representatives work in a team approach with the OTDA Jobs Program staff contacting local employers on periodic basis. The four Employment Representatives are on a rotating schedule.

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

OTDA Jobs Program staff are charged with job development as indicated in section 2.3. Additional information, if any, is described below:

OTDA Jobs Program staff work with district staff contacting local employers on a periodic basis.

### Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:  
Washington County has a small selection of educational providers to serve clients with educational needs. This district has narrowed the educational providers down to the following: BOCES, 11 South St., Glens Falls, NY for High School Equivalency/adult education classes, the Washington County Career Center who has a High School Equivalency program for youth coupled with a work experience component, and Literacy Volunteers in Glens Falls for clients needing English language instruction and assistance with developing reading skills. This district has chosen these providers based on a long history of successful outcomes.
- b. Describe how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:  
The Employment Representative identifies clients from their caseloads who would be appropriate for Vocational Education and Job Skills Training programs then makes the necessary referrals. This district refers clients to providers that can best meet the clients educational needs and have a proven history of effectiveness in the delivery of

education/training through successful outcomes.

- c. Describe the process and guideline workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity:  
The Employment Representative will refer the client to the appropriate agency to assist the client in locating the educational activity that are available in the community that will best suit the client's needs. As contracted with the Washington County Career Center all participants of the Job Search Training complete a Career Interest Inventory, a Math Skill Assessment and a Reading Assessment and are screened for educational and training opportunities that would help them become more marketable and increase their earning power.
- d. Describe the district's process and policy, including the guideline workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the agency would deny participation in educational activities:

This district will encourage and may require clients to participate in educational activities to the extent of the educational activity is appropriate for the individual based on the client's educational needs, the client's level of interest in participating in an educational activity, history of compliance, the success rate in previous activities the client has been assigned to participate in and whether or not the provider is an approved provider and the providers willingness to cooperate with the district to obtain completed time sheets to document hourly participation as needed to meet federal and state work participation requirements. The Agency will deny approval of an educational activity requested by a client if the educational activity is not appropriate for the client's educational needs, if the the client has a history of non-compliance and a low success rate in previous activities assigned. This Agency may also deny approval for an educational activity if the provider is not an approved provider and/or the provider has an unwillingness to cooperate with the district to obtain completed time sheets to document hourly participation. In addition to the educational activity, the client will be assigned to other core work activities with at least 20 hours per week of participation for the purpose of meeting federal and state participation rates. These core activities would include employment and work experience.

- e. Describe the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities:  
To the extent possible, assignment will be based on the educational needs of the client as determined during the assessment and employability plan interview and the participant's history of compliance in similar and other work activities. The participant must agree to comply with all attendance and reporting requirements of the program and local district. Other factors would include: participant's abilities and aptitudes and ability to successfully complete the desired program, prerequisite skills necessary for participation in the program. The participant must agree to participate in other work activities a minimum of 20 hours as required by federal and state participation rate regulations.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:  
Two-year college programs are the highest level of education level the the district approves as a work activity. To the extent possible, assignment will be based on the educational needs of the client as determined during the assessment and employability plan interview and the participant's history of compliance in similar and other work activities. The participant must agree to comply with all attendance and reporting requirements of the program and local district. Other factors would include: participant's abilities and aptitudes and ability to successfully complete the desired program, prerequisite skills necessary for participation in the program. The participant must agree to participate in other work activities a minimum of 20 hours as required by federal and state participation rate regulations.
- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:  
The Welfare Employment Representatives will monitor their assigned caseload and determine if the client is currently enrolled in a paid work study program or would assist the client with obtaining paid employment through job search and referral to OTDA Jobs for possible referrals for job openings. In the event the client is unable to locate paid employment the client will be concurrently assigned to a work experience activity beyond the 12 month lifetime limit.
- h. Education and training providers are evaluated by the following standards:  
a. The education/training must be designed to enhance the participant's opportunity to secure unsubsidized employment or increase their earning power in the local labor market.  
b. The provider must have a proven history of effectiveness in the delivery of education/training programs.  
c. The program must be no more than one year in duration unless it is accompanied by a countable work activity.  
d. The provider must agree to communicate with the district via regular case conferences, telephone contact, providing case file notes and weekly time records.
- i. The district procedure for advising participants of approved training providers is:  
Each individual is scheduled a face to face appointment to meet with an Welfare Employment Representative to complete an employment assessment and employability plan, the employment worker notifies the participant of approved training providers and available program opportunities.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
Each recipient is notified in writing and by mail of their enrollment in a work activity. This letter of notification would include all pertinent details concerning the enrollment such as: a description of the program, date and time to report, reasons for the assignment, who to report to and where, and consequences for not cooperating with the enrollment.

Approval for enrollment in work activities is made at the district's discretion taking into consideration the needs of the client and the district's ability to attain the state and federal participation rates.

- k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:

It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.

The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.

The institution or student fails to monitor and report information regarding the student's attendance and performance as required.

The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

Additional reasons as stated below:

- l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:

These individuals are assigned to an employment worker who monitors enrollment. Enrollment in school must be verified in writing. Verification is requested at application and recertification.

- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:

The district advises the individual's supervisor verbally and in writing of any health related limitations that need to be accommodated by the work-site.

### **Section 3.7 Work Verification**

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from

which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

Each district must describe how it will conduct periodic self audits to determine that system entries are consistent with documentation in case files. The district must also explain how it will choose the sample size, select sample cases and establish the review period (no less frequently than semi-annually). The plan must indicate the district will maintain documentation on all pertinent findings produced through its self audit process and that case records for all reviewed cases will be available for State and other auditors in their review of the local work verification system for the standard 6 year period associated with such reviews.

The district will sample cases from each month within the (6 month) semi-annual period. The October to March review will be due by May 20th. The April to September review will be due by November 20th. The results of these audits will enable the district to identify policies, processes or cases that may need corrective action.

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at [AQI.WV.SelfAudits@otda.ny.gov](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

**The Quality Assurance (QA) plan must include the following elements:**

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of

age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

**The District’s Quality Assurance Process is as follows:**

The district will perform a random sample of (6) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

The district will perform a random sample of (6) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability code **38-needed in the home fulltime or employability code 48-time limit exemption** to care for a disabled household member to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

The district will review district worker or approved provider/vendor collected documentation and data entry of the above listed elements. The district will assess and verify that participation in the reported work activities listed above meet the State approved definition for the activity.

**Use of Outside Providers/Vendors**

Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?

Yes       No



If Yes, does the district's provider/vendor collected documentation, data entry and management of WTCMS follow the same process that would be used by the district worker?

Yes       No

If No, please describe the process used below:

### **Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency**

Following is a description of how the district accommodates the needs of Non-English-speaking participants in accessing employment activities and services:

In the event the situation arises Washington County uses the Language Line Services to help communicate with the non-English speaking population. Washington County currently has a Social Services Examiner that is fluent in Spanish and is available to all units as an interpreter.

### **Section 3.9 Strategies/Procedures for Increasing Program Attendance**

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

The Employment Representatives meet with each applying adult in the household at the time of their face to face Temporary Assistance interview to discuss work activities and the importance of compliance. Washington County's orientation procedures are designed to help better educate the client as to programs and services offered and help reduce the amount of non-compliance. During supervisory level meetings the subject of reducing agency requirements that conflict with work schedules is discussed. Supervisors are on board with not allowing an individual to miss work to attend an agency appointment.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants**

District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:

District attempts to engage sanctioned participants during different times in the sanction period using the following strategies.

The district calls in the sanctioned individual into the agency for an investigative interview. The client then meets with Temporary Assistance Examiner, the Employment worker and someone from the Investigations Unit. After the investigative interview is complete, employment staff will offer the individual an opportunity to engage in work activities and discuss issues that may be contributing to the non-compliance. If the client does not report for an Investigative Interview the case is closed according to TA eligibility requirements. After period of ineligibility for an

applicant job quit, the individual is sent an appointment letter advising them they would need to apply to be added to the Temporary Assistance case due to filing unit requirements. The applicant would be scheduled an appointment with a Welfare Employment Representative to complete an assessment and to be assigned work activities. If the applicant fails to appear for the employment assessment appointment the application is denied and the Temporary Assistance case is closed.

### **Section 3.11 Strategies for reducing the need for TA**

District's strategies for reducing the need for TA are described below:

Washington County uses diversion strategies to assist clients with accessing other sources of income to meet their needs. The diversion procedure is as follows: The Employment worker sees the applicant during the application process for Temporary Assistance. At that time the applicant is given employment requirements: supervised job search, appointment with the Jobs Representative and assignment to job search training. It is also at this time that the agency job development procedure begins for the client. Many clients are diverted from receiving assistance because they find employment or the Agency assists them in finding employment. The Temporary Assistance Unit may assist if eligible with one-time emergency assistance payments which may divert the need for on-going assistance. The Employment and the Temporary Assistance Units work together in this process.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

### **Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District**

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:  
Transportation in the form of bus tokens for individuals with access to public transportation. Also included in the Flexible Fund for Family Services for Washington County is an allocation for the purchase of gas cards and bus passes for TANF eligible individuals to enable the applicant/recipient to continue in or accept employment. Work related expenses such as clothing, including but not limited to uniforms and footwear; job related safety equipment and tools not provided by the worksite or employer. These services are limited to gas cards up to \$50 per month if they travel 10 or more miles one way to work and \$25 per month if they travel less than 10 miles one way to work, help with car insurance-registration maximum of \$150.00 per family one-time payment, vehicle repairs up to a maximum of \$400 per family one-time payment and taxi rides to and from work until they receive their first pay check. The Agency may also provide limited funding not to exceed \$200 for the job related items that could include steel-toed boots, uniforms, shoes and tools.

- b. The district will use the following approach to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

Every attempt is made to assign the individual to a work activity in the town or village in which they reside. We have also made a greater use of taxi services to transport individuals to work assignments on a temporary basis while they are making other arrangements. At times we are not able to assign someone to an activity right in their town or village. During those rare times and because Washington County is a rural county, the client would be expected to walk up to 2 miles to a site. The rationale is that all closer work sites have been ruled out for various reasons and an assignment must be made for participation. In some cases clients may not live on the bus route and therefore they are advised that they must walk up to 2 miles to get to the closest bus stop in order to get to their assigned work activity. In all cases, the individual's work limitations and circumstances will be taken into account when requiring someone to walk to an assigned work activity and that appropriate adjustments will be made based on such limitations.

- d. The district will provide the following services to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:  
The district may provide any other supportive services which it deems necessary to allow individuals to secure employment or maintain their employment, if funding is available. These services may include transportation items such as gas cards up to \$50 per month if they travel 10 or more miles one way to work and \$25 per month if they travel less than 10 miles one way to work, bus tokens, help with car insurance-registration maximum of \$150.00 per family one time payment, vehicle repairs up to a maximum of \$400 per family one-time payment and taxi rides to and from work until they receive their first pay check. The Agency may also provide limited funding not to exceed \$200 for job related items including steel-toed boots, uniforms, shoes and tools.

Supportive services may be provided for up to 90 days to individuals who have lost eligibility for Temporary Assistance due to employment.

## **Section 4.2 Transitional Support Services**

The district will provide the following supports and strategies to support job retention:

In addition to those services already mentioned, the district will provide a designated amount on a card that can be redeemed at a local retailer that carry most work-related items such as steel-toed boots, non-slip shoes and nurse's aide uniforms which are in-demand items for our clients.

The district will provide the following support services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment:

Transitional child care payments may be available for eligible families following their Temporary Assistance case closure due to excess income, client request or increased child support and there is need for child care to be able to remain employed. During this time period the client would need to apply for ongoing child care benefits and would continue to receive child care assistance if determined financially eligible.

## **Section 4.3 Extended Support Services**

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines:

Supportive Services available are gas cards and bus passes. The Welfare Employment Representatives will also provide information and referrals to community based agencies that can assist the client with meeting their needs.

## **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

The district's conciliation process for TA applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

When a recipient fails to comply with work activity assignments a Conciliation Notice is sent to the recipient advising them of their non-compliance and the recipient must respond to the conciliation within 10 days. If the client requests conciliation, they will be given a scheduled appointment to meet with the Welfare Employment Representative. If the client is not able to appear in person for the conciliation, the conciliation will be conducted via phone. The client has the opportunity to submit additional documentation to justify their reason for non-compliance. A written document is established with the client's reason for failure to comply with the assigned

activity. The document is signed by the client if the client appears in person. A copy of this document is given to the client or mailed to the client and the district retains the original copy for the record. The client is advised that their claimed reason for failing to comply with the assigned activity will be discussed with a supervisor and they will be notified of the outcome by mail. The client is advised of their right to a fair hearing if they do not agree with the results of the conciliation. If the individual's failure to comply was determined to be without good cause and is ineligible for an exemption, a ten day notice of negative action will be issued.

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

This district does not currently mandate Non-TA SNAP applicants and recipients to participate in SNAP work activities. TA SNAP applicants and recipients failure to comply with a TA/SNAP employment requirement would be offered the opportunity to submit documentation supporting their claim of good cause or request for exemption. When that documentation is received the worker and the supervisor will review the documentation submitted and any pertinent information in the client's file to determine if the client is eligible for an exemption or the claim of good cause is justified. If it is determined that the failure to comply was with good cause, or the individual demonstrates compliance with the SNAP E&T activity assigned by the district to avoid the SNAP sanction or the client is eligible for an exemption, no negative action will be taken. TA/SNAP recipients who are subject to SNAP work requirements who fail to comply with an assigned employment activity will be sent Conciliation Notification, LDSS 4230 or LDSS 4230A depending on the status of the TA case (active or pending), and will be given the opportunity to avoid the imposition of a SNAP E&T sanction through program compliance. Once the conciliation notice is sent, the individual will have 10 days to contact the Employment Representative and be assigned to a job search consisting of 5 job contacts and will be given three days to complete the job search and submit verification of their efforts to their Employment Representative. If the client fails to complete and submit the 5 job contacts in the specified period of time to avoid a sanction and it is determined that the individual's failure to comply was without good cause and ineligible for an exemption, a ten day notice of negative action will be issued.

The SNAP E&T good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

SNAP recipients who are subject to SNAP work requirements who fail to comply with an assigned employment activity will be sent Conciliation Notification and will be given the opportunity to avoid the imposition of a SNAP E&T sanction through program compliance. Once the conciliation notice is sent, the individual will have 10 days to contact the Employment Representative and be assigned to a job search consisting of 5 job contacts and submit verification of their efforts to their Employment Representative. If the client fails to complete and submit the 5 job contacts in the specified period of time to avoid a sanction and it is determined that the individual's failure to comply was without good cause and ineligible for an exemption, a ten day notice of negative action will be issued.

## **Section 5.2 Sanctions**

- a. The district's procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:  
A review of why the individual was sanctioned is done. If possible, the individual will be assigned to that same activity and will have to show compliance in that activity. Showing compliance will mean actually doing the activity. It will not be enough to sign a statement indicating they are now willing to comply. For example, if an individual was sanctioned for failure to comply with work experience, they must attend a work experience assignment for 3 days to show compliance before the sanction is ended. If the individual is not able to be assigned to the same activity to show compliance, then they will be assigned to another comparable work activity to demonstrate compliance. Their benefits will be restored back to the date they advised the Agency they were willing to comply once they completed the 3 days at a work experience site or other agreed upon activity to show willingness to comply, but not before the end of the durational period. The sanctioned individual will be added back into case count without the need for a new application if the sanction did not result in case closure. If after the durational sanction period has ended the client claims to be work exempt the client will be added back to the case in the same time frame as a non-exempt individual who has complied and will be given the opportunity to submit medical documentation
  
- b. The district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:  
A review of why the individual was sanctioned is done. If possible, the individual will be assigned to the same work activity and will have to show compliance in that activity. Showing compliance will mean actually doing the activity. It will not be enough to sign a statement indicating they are now willing to comply. The time period established for demonstrating compliance will be 3 days before the sanction is ended. The sanctioned individual will be added back into the SNAP case count the month after the individual contacted the Agency advising they were willing to comply provided the durational sanction period has ended. If the individual provides proof of an exemption from SNAP work registration, the individual would be added back to the SNAP case count the month

after the documentation is submitted even if the durational sanction period has not ended.

### **Section 5.3 Dispute Resolution**

The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations is conducted in accordance with 18 NYCRR 385.11.

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check **all** that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
- Other process (please describe):

When a disability is claimed by a Temporary Assistance applicant or recipient the individual is given an LDSS 4526, Medical Examination for Employment Assessment, Disability Screening, and Alcoholism/Drug Addiction Determination, to have completed by their physician and returned to this Agency within 10 days. When the completed LDSS 4526 is returned to this Agency the form is reviewed by the worker to determine if it has all necessary information to determine employability. If it does not, the worker contacts the doctor to gather the additional information needed to determine employability.

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status.
- District review team reviews and determines status (described below).
- Specialized disability/medical staff or unit reviews and determines status (described below)

Other:

When a disability is claimed at application or recertification, or whenever there is reason to believe that an individual has a physical or mental impairment, the social services official will give the individual a medical form to be completed and returned to the agency within 10 days. The individual is advised that this documentation is required in order for the district to determine whether the individual is exempt, nonexempt or work limited. When all documentation is submitted the employment worker and supervisor reviews and determines status. The worker sends the client a LDSS 4005 or LDSS 4005A advising them of the districts employability determination. Each individual claiming a disability has a face-to-face meeting with an employment worker to review their medical information and to accomplish the following steps: (1) the disabling factor is identified and the individual's level of participation is determined; (2) an individual participation plan is developed which includes any treatment plans specified by the physician or psychiatrist. Appropriate referrals will be made making use of existing community resources including non-contract provider Liberty House; (3) a referral for SSI is made if deemed appropriate. A letter is sent to the individual advising them that they must apply for SSI and provide verification of this. The employment worker tracks compliance with the SSI application requirement and appropriate action is taken if this is not done. When a disability is claimed by a Temporary Assistance applicant or recipient the individual is given an LDSS 4526, Medical Examination for Employment Assessment, Disability Screening, and Alcoholism/Drug Addiction Determination, to have completed by their physician and returned to this Agency within 10 days. When the completed LDSS 4526 is returned to this Agency the form is reviewed by the worker to determine if it has all necessary information to determine employability. If it does not, the worker contacts the doctor to gather the additional information needed to determine employability.

### **Section 6.2 Mental Health Screening and Assessment**

The district is administering a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes       No (*If No, section 6.2 is complete*)

If yes: Describe the district's policy for determining when a program participant is offered a mental health screen.

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes       No

If using the MMS, indicate the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation:



If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

### **Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))**

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual in recovering from a mental or physical impairment, accept referral to and enrollment in a program of vocational rehabilitation, training, and/or other essential rehabilitation, and provide requested evidence that he/she is participating in the assigned program.

- a. Following is the district's procedure for determining if an individual who is unable to work due to mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):  
Each individual that claims a disability is required to submit a medical form from their medical provider. When the medical form is returned, the employment worker verifies that a specific diagnosis is indicated, any work limitation or disabilities are present, and length of time the client will be disabled and if treatment is recommended. This information is reviewed with the unit supervisor.
- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:  
If the medical indicates that treatment is needed in order for the client to be restored to self-sufficiency, then the client is notified in writing that they are obligated to enter such treatment program and show verification that they have enrolled and are attending. The Employment Representatives are familiar with available resources and providers in the community and are able to make appropriate referrals for appropriate treatment. This process may also include a requirement to apply for SSI so that a reduced dependence on TA may be pursued. This must also be verified by the client.
- c. Following is the district's procedure for tracking the participant's compliance with the treatment plan, including who in the district is responsible for monitoring compliance. Include elements such as monthly confirmation of attendance at rehabilitation or other factors to judge participation and progress, along with how often the treatment plan is

updated:

When a treatment plan is initiated, the client is advised by the district of the requirement for them to participate in the designated treatment program and the employment worker is responsible to obtain tracking forms completed by the physician/therapist on a monthly basis. The form documents the dates of actual attendance, the hours per day, any missed appointments and progress updates.